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April 3, 2006

VIA HAND DELIVERY

Mary Cottrell, Secretary
Department of Telecommunications & Energy
One South Station
Boston, MA 02110

Re: DTE 05-82

Dear Secretary Cottrell:

Enclosed please find the Comments of Boston Edison Company, Commonwealth Electric Company, Cambridge Electric Light Company and NSTAR Gas Company, (collectively referred to as either "NSTAR" or the "NSTAR Companies"), relative to the above referenced matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeffrey N. Stevens".

Jeffrey N. Stevens
Assistant General Counsel

Enclosures

cc: Service List DTE 05-82

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Dig Safe System, Inc.
For Implementation of 811 as the
Abbreviated Dialing Code for
Providing Notification
of Excavation Activities

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D.T.E. 05-82

**COMMENTS OF BOSTON EDISON COMPANY,
COMMONWEALTH ELECTRIC COMPANY,
CAMBRIDGE ELECTRIC LIGHT COMPANY,
AND NSTAR GAS COMPANY**

Boston Edison Company, Commonwealth Electric Company, Cambridge Electric Light Company and NSTAR Gas Company, (collectively referred to as either “NSTAR” or the “NSTAR Companies”), submit these comments in the above referenced docket. The Department of Telecommunications and Energy’s (“Department”) Procedural Notice, dated march 26, 2006, seeks comments from the parties on a variety of issues relative to this matter.

1. Implementation of 811 by Users of the One Call System

The NSTAR Companies are underground facility operators and receive and respond to notifications of excavation activities from the call center operated by Dig Safe System, Inc. (“Dig Safe”). On implementation of 811, NSTAR will continue to receive notifications from Dig Safe and as such the NSTAR Companies will not be required to undertake any steps to implement 811.

2. Schedule and Costs for Implementing 811

The Federal Communications Commission order on the implementation of 811 (the "FCC Order") requires implementation of 811 by telecommunications carriers by April 13, 2007. The FCC Order requires the telecommunications carriers to implement 811 by directing calls to a toll free number supplied by the one call center. The cost of the toll free number will be borne by Dig Safe. The cost to direct 811 calls to the Dig Safe toll free number will be borne by the telecommunications providers.

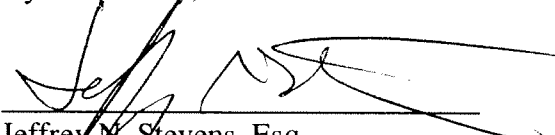
3. Evidentiary Hearings

Based on its current understanding of the implementation of 811, the NSTAR Companies do not believe that evidentiary hearings are necessary.

WHEREFORE, NSTAR respectfully submits these comments to the Department.

**BOSTON EDISON COMPANY,
COMMONWEALTH ELECTRIC COMPANY,
CAMBRIDGE ELECTRIC LIGHT COMPANY,
AND NSTAR GAS COMPANY**

By its attorney,

A handwritten signature in black ink, appearing to read "Jeffrey M. Stevens", is written over a horizontal line.

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DATED: April 3, 2006

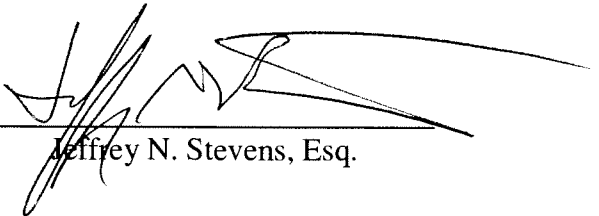
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D.T.E. 05-82

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the foregoing document on all persons named on the service list in D.T.E. 05-82.



Jeffrey N. Stevens, Esq.

Dated: April 3, 2006